

## EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

CAPELLA PHOTONICS, INC.,

Plaintiff,

v.

INFINERA CORPORATION,  
TELLABS, INC., TELLABS  
OPERATIONS INC., CORIANT  
AMERICA INC., and CORIANT (USA)  
INC.,

Defendants.

Case No. 2:20-cv-77-JRG

**DEFENDANTS' FIRST SET OF INTERROGATORIES (NOS. 1-20) TO PLAINTIFF  
CAPELLA PHOTONICS, INC.**

In accordance with Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants Infinera Corporation, Tellabs, Inc., Tellabs Operations Inc., Coriant America Inc., and Coriant (USA) Inc. hereby request that Plaintiff Capella Photonics, Inc.'s ("Plaintiff") respond to the following interrogatories within thirty (30) days of service.

**DEFINITIONS**

1. "Plaintiff," "Capella," "You," and "Your" means Capella Photonics, Inc. and any present or former parent, subsidiary, department, division, subdivision, branch, affiliate, trustee, or other related entity, predecessor in title to the Asserted Patents, officer, director, agent, representative, consultant, servant, employee, holder of a security interest, attorney, or any other person acting on or purporting to act on its behalf.
2. "Defendant(s)" "You," and "Your" means Infinera Corporation, Tellabs, Inc., Tellabs Operations Inc. n/k/a Infinera Optical Networks, Inc., Coriant America Inc. n/k/a

6. If you assert a claim of privilege or work product protection in objecting to any interrogatory, identify with respect to each communication, document, or tangible thing the nature and basis of the privilege claimed, and provide as much of the following information as is not encompassed by the privilege: its type; its general subject matter and purpose; its date; the names of persons making or receiving the communication, document, or tangible thing or a copy thereof or, if the communication was oral, the names of those present when the communication was made; their relationship to the author or speaker; and any other information needed to determine the applicability of the privilege or protection.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 1**

Identify and describe all factual and legal bases that support or contradict the priority date You contend that each Asserted Claim is entitled to.

#### **INTERROGATORY NO. 2**

Identify and describe all factual and legal bases that support or contradict any allegation that a Capella Product practices any claim of any Asserted Patent, including an identification of which claim is practiced by the Capella Product.

#### **INTERROGATORY NO. 3**

Identify and describe all facts concerning actual or potential licensing or other assertion of any Asserted Patent, Predecessor Patent, or any Related U.S. or Foreign Patents.

#### **INTERROGATORY NO. 4**

Identify and describe all factual and legal bases that support or contradict Your damages claim.

**INTERROGATORY NO. 20**

Identify and describe all efforts by You to mark Capella Products with the Asserted Patents, or any other actions undertaken to comply with 35 U.S.C. § 287, whether by Capella or a licensee to any of the Asserted Patents.

Dated: October 9, 2020

Respectfully submitted,

/s/ Lauren J. Dreyer

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Attorneys for Defendants, INFINERA  
CORPORATION, TELLABS, INC.,  
TELLABS OPERATIONS INC.,  
CORIANT AMERICA INC., and  
CORIANT (USA) INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served on all counsel of record who have consented to electronic service on this 9th day of October, 2020.

*/s/ Lauren J. Dreyer*  
Lauren J. Dreyer